

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF WISCONSIN

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In re:

CASE NO. 14-23343-PP

(Chapter 7)

EIHAB F. ATOUT

Debtor

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**MOTION TO EXTEND THE TIME WITHIN WHICH THE TRUSTEE, U.S. TRUSTEE AND CREDITORS MAY OBJECT TO DISCHARGE, TO DELAY THE GRANTING OF DISCHARGE AND FOR TURNOVER OF INFORMATION AND DOCUMENTS**

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Now comes Douglas F. Mann, Trustee in Bankruptcy of the above-named Debtors, and moves the Court as follows:

1. That the undersigned is the duly appointed, qualified, and acting Chapter 7 Trustee of the above-named Debtor.
2. This case was filed March 28, 2014.
3. Prior to the initial §341 Meeting on May 15, 2014 in Kenosha, Wisconsin, Trustee requested various information and documents.
4. At the §341 Meeting, a number of questions arose and an adjournment sheet was given (Exhibit 1) requesting various information and documents which are itemized on the adjournment sheet.
5. At the continued §341 Meeting on June 4, 2014 and prior to that time, the Debtor produced no information and none of the documents requested on May 15, 2014.
6. As a result, the questioning on June 11, 2014, additional information and documents were requested per the attached adjournment sheet (Exhibit 2) as well as a follow-up on the previous request.
7. Since May 15, 2014, the Debtor has produced not (1) scrap of paper for the Trustee to evaluate assets, debts and transfers by the Debtor.

WHEREFORE, Trustee moves the Court as follows:

1. To delay the granting of discharge through and including September 14, 2014;
2. To allow the Trustee and the U.S. Trustee through and including September 14, 2014, to object to discharge under 11 U.S.C. §727;

3. To allow creditors through and including September 14, 2014 to object to discharge under 11 U.S.C. §523 and §727.
4. To order the Debtor to turnover to the Trustee all information and documents requested in Exhibits (1) and (2) within (10) days of June 11, 2014.
5. For such other and further relief as is necessary.

Dated at Milwaukee, Wisconsin, this 12<sup>th</sup> day of June, 2014



DOUGLAS F. MANN  
Chapter 7 Trustee

Douglas F. Mann  
Trustee in Bankruptcy  
River Bank Plaza, Suite 210  
740 North Plankinton Avenue  
Milwaukee, Wisconsin 53203  
(414) 276-5355 (telephone)  
(414) 276-5350 (facsimile)

blb

**DOUGLAS F. MANN**  
ATTORNEY AT LAW  
SUITE 210, RIVER BANK PLAZA  
740 NORTH PLANKINTON AVENUE  
MILWAUKEE, WISCONSIN 53203-2403

Telephone  
(414) 276-5355

Faximile  
(414) 271-1328

Date: 5-15-14

Debtor/Debtor's Attorney

RE: **BANKRUPTCY OF Atout, Ehab**  
**CASE NO. 14-23343**

Gentlepersons:

As requested by the Trustee, you have agreed to provide the following items to the Trustee within 10 days of the date above:

1. Social security identifying document such as S.S. Card, 1099, W-2 or letter from S.S. office
2. Schedule E domestic support address for spouse.
3. Copy of financial statements for you and your wife filed in your divorce.
4. Security and appraisal docs for Shoot LLC
- 4a. Trust and security docs for shopping centers property transferred.
5. Listing of all properties signed back to bank with supporting documents
- 5a. Bravo Asset disclosure and operation/wage documents.

The Section 341 meeting was continued/adjourned (for production of documents and testimony) to:

Date: 6-4-14 Time: 8:30 am Location: Kenosha County Center

Very truly yours,

*Douglas F. Mann*  
Douglas F. Mann  
Chapter 7 Trustee

DFM/kmj

6. Amend to reflect and value all tax refunds or turn over to Trustee.
7. Ryan Road properties all leases for tenants and disbursement records for past 2 years. Include names of Trustees, and attorney names and addresses who created Trust, leases or negotiations.

**DOUGLAS F. MANN**  
ATTORNEY AT LAW  
SUITE 210, RIVER BANK PLAZA  
740 NORTH PLANKINTON AVENUE  
MILWAUKEE, WISCONSIN 53203-2403

Telephone  
(414) 276-5355

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(414) 271-1328

Date: 6-11-14

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Debtor/Debtor's Attorney

RE: BANKRUPTCY OF Zihab Atout  
CASE NO. 14-23343

Gentlepersons:

As requested by the Trustee, you have agreed to provide the following items to the Trustee within 10 days of the date above:

1. Original security verification document such as social security card or 1099
2. Full name & address of wife
- 2a. Name and address of attorney forming EFA Trust,
- 2b. Name and addresses of trustees (all seven) of EFA.
3. Books and records of Bravo for 2014 and 2013, including bank statements & tax returns
4. All tax refunds for all years anywhere in world.
5. Copy of records on computer, or actual computer, or user names + passwords for cloud and email access. and smartphone

The Section 341 meeting was continued/adjourned (for production of documents and testimony) to:

Date: 7-3-14 Time: 8:30 am Location: Milwaukee  
9:30

Very truly yours,

see page 2

Douglas F. Mann  
Chapter 7 Trustee

DFM/kmj



DOUGLAS F. MANN  
ATTORNEY AT LAW  
SUITE 210, RIVER BANK PLAZA  
740 NORTH PLANKINTON AVENUE  
MILWAUKEE, WISCONSIN 53203-2403

Telephone  
(414) 276-5355

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(414) 271-1328

Date: 6-11-14

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Debtor/Debtor's Attorney

RE: BANKRUPTCY OF *Eihab Aboot*  
CASE NO. 14-23343

Gentlepersons:

As requested by the Trustee, you have agreed to provide the following items to the Trustee within 10 days of the date above:

6. Documents from PSI regarding environmental issue
7. Documents and explanation in affidavit form of how stock equity becomes asset.
8. Sister's full name and address where you stay when you are not at hotel.
9. Out of state addresses and name of all persons who you stay with when not at hotel
10. Copy of bank statements for every bank or credit or debit card you used for past two years.

The Section 341 meeting was continued/adjourned (for production of documents and testimony) to:

Date: 7-3-14 Time: 9:30am Location: Milwaukee

Very truly yours,

See page 3

Douglas F. Mann  
Chapter 7 Trustee

11. All other documents requested at last hearing in writing on 5-15-14.

DOUGLAS F. MANN  
ATTORNEY AT LAW  
SUITE 210, RIVER BANK PLAZA  
740 NORTH PLANKINTON AVENUE  
MILWAUKEE, WISCONSIN 53203-2403

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(414) 271-1328

Date: 6-11-14

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Debtor/Debtor's Attorney

RE: BANKRUPTCY OF *Eihab Atout*  
CASE NO. 14-23343

Gentlepersons:

As requested by the Trustee, you have agreed to provide the following items to the Trustee within 10 days of the date above:

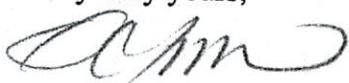
12. Copy of all phone records for past 18 months.
13. List of all jobs (contractor OR subcontractor) including names and addresses.
14. Copy of Hair salon lease.
15. Copy of hotel printout of all rentals since 07-13 at Candlewood.

5. \_\_\_\_\_

The Section 341 meeting was continued/adjourned (for production of documents and testimony) to:

Date: 7-3-14 Time: 9:30 am Location: Milwaukee

Very truly yours,



Douglas F. Mann  
Chapter 7 Trustee

DFM/kmj

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF WISCONSIN

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In re:

CASE NO. 14-23343-PP  
(Chapter 7)

EIHAB F. ATOUT

Debtor

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**NOTICE OF MOTION TO EXTEND THE TIME WITHIN WHICH THE TRUSTEE, U.S.  
TRUSTEE AND CREDITORS MAY OBJECT TO DISCHARGE, TO DELAY THE  
GRANTING OF DISCHARGE AND FOR TURNOVER OF INFORMATION AND  
DOCUMENTS**

TO THE CREDITORS AND OTHER INTERESTED PARTIES OF THE DEBTOR:

DOUGLAS F. MANN, Chapter 7 Trustee, has filed papers with the Court. A copy of the Motion is attached hereto.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

If you do not want the court to approve the relief sought in the motion, or if you want the court to consider your views on the motion, then by **June 19, 2014** you or your attorney must:

1. File with the court a written objection stating the legal and factual basis for your objection at the following address:

Clerk of the Bankruptcy Court  
U. S. Courthouse  
517 East Wisconsin Avenue, Room 126  
Milwaukee, Wisconsin 53202

2. If you mail your objection to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above.
3. You must also mail a copy of your objection to:

Douglas F. Mann  
Chapter 7 Trustee  
740 North Plankinton Avenue, #210  
Milwaukee, Wisconsin 53203

and

U. S. Trustee  
U. S. Courthouse  
517 East Wisconsin Avenue, Suite 430  
Milwaukee, Wisconsin 53202

4. Attend the hearing at such date and time as may be scheduled by the Court.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief.

Dated in Milwaukee, Wisconsin this 12<sup>th</sup> day of June, 2014



DOUGLAS F. MANN  
Chapter 7 Trustee

Douglas F. Mann  
Trustee in Bankruptcy  
River Bank Plaza, Suite 210  
740 North Plankinton Avenue  
Milwaukee, Wisconsin 53203  
(414) 276-5355 (telephone)  
(414) 276-5350 (facsimile)

blb

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF WISCONSIN

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In re:

CASE NO. 14-23343-PP

(Chapter 7)

EIHAB F. ATOUT

Debtor

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**CERTIFICATE OF SERVICE BY MAIL**

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I, BETH BERTRAM, of the law offices of Douglas F. Mann, Attorney at Law, 740 North Plankinton Avenue, Suite 210, Milwaukee, Wisconsin, 53203-2403, certify:

That I am, and at all times hereinafter mentioned was, more than 18 years of age;

That on the 12<sup>th</sup> day of June, 2014 I served a copy of the within Notice of Motion and Motion on the following parties:

U. S. Trustee  
Via electronic service

Anthony J. Kryshak  
Via electronic service

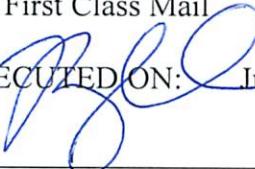
Eihab F. Atout  
10200 74<sup>th</sup> Street, #303  
Kenosha, Wisconsin 53142

Via First Class Mail

Trustone Financial Federal  
Credit Union  
c/o Darneider & Geraghty  
735 North Water Street, #930  
Milwaukee, Wisconsin 53202

Via First Class Mail

EXECUTED ON: June 12, 2014

  
BETH L. BERTRAM